

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD, et al.

Defendants.

Civil Case No. 2:22-cv-00293-JRG  
(Lead Case)

**JURY TRIAL DEMANDED**

NETLIST, INC.

Plaintiff,

v.

MICRON TECHNOLOGY TEXAS, LLC, et al.

Defendants.

Civil Case No. 2:22-cv-00294-JRG  
(Member Case)

**JURY TRIAL DEMANDED**

**SAMSUNG'S UNOPPOSED MOTION FOR LEAVE TO FILE CORRECTED  
VERSIONS OF CERTAIN PAPERS AND TO STRIKE UNCORRECTED VERSIONS**

Plaintiff Samsung respectfully requests leave to file corrected versions of its Motion To Bifurcate (Dkt. 372) and Exhibit 3 thereto (Dkt. 372-3). Due to an unintentional error during preparation, the uncorrected Motion cites non-public trial testimony, specifically 1174:18-1177:7, from *Netlist, Inc. v. Samsung Electronics Co.*, No. 2:21-CV-463 (E.D. Tex.) (“*EDTX1*”), and provides incorrect page numbers for cites to public *EDTX1* trial testimony, specifically 686:20-689:11 and 720:8-734:25. The uncorrected exhibit reproduces the non-public testimony and incorrect page numbers. Samsung seeks leave to file a Corrected Motion To Bifurcate, which removes the improper citation and conforms other citations; and Corrected Exhibit 3, which includes no non-public testimony. There are no other substantive changes. Samsung provides the attached redline version of the corrected

Motion to highlight its corrections (Exhibit A). Samsung asks that the uncorrected versions be stricken from the docket as having been filed in error. Netlist does not oppose such relief.

Dated: January 22, 2024

Respectfully submitted,

By: /s/ Daniel A. Tishman

Melissa Richards Smith  
melissa@gillamsmith.com  
GILLAM & SMITH, LLP  
303 South Washington Ave.  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

J. Travis Underwood  
Texas Bar No. 24102587  
travis@gillamsmithlaw.com  
GILLAM & SMITH, LLP  
102 North College Avenue, Suite 800  
Tyler, Texas 75702  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Brian R. Nester  
DC Bar No. 460225  
bnester@cov.com  
COVINGTON & BURLING LLP  
One CityCenter 850 Tenth Street, N  
Washington, DC 20001-4956  
Telephone: (202)-662-6000

Alice J. Ahn  
CA Bar No. 271399/DC Bar No. 1004350  
aahn@cov.com  
COVINGTON & BURLING LLP  
415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: (415) 591-7091  
Facsimile: (415) 955-6571

Ruffin B. Cordell  
TX Bar No. 04820550  
cordell@fr.com  
Michael J. McKeon  
D.C. Bar No. 459780  
mckeon@fr.com  
Lauren A. Degnan  
D.C. Bar No. 452421  
degnan@fr.com  
Daniel A. Tishman  
DC Bar No. 1013923  
tishman@fr.com  
FISH & RICHARDSON P.C.  
1000 Maine Avenue, SW  
Washington, DC 20024  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331

Francis J. Albert  
CA Bar No. 247741  
albert@fr.com  
FISH & RICHARDSON P.C.  
12860 El Camino Real, Ste. 400  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099

Thomas H. Reger II  
reger@fr.com  
Texas Bar No. 24032992  
FISH & RICHARDSON P.C.  
1717 Main Street, Suite 5000  
Dallas, Texas 75201  
Telephone: (214) 747-5070  
Facsimile: (214) 747-2091

*Attorneys for Defendants Samsung Electronics Co., Ltd.;  
Samsung Electronics America, Inc.; and Samsung Semiconductor, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on January 22, 2024. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A) and via electronic mail.

/s/ Daniel A. Tishman

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules CV-7(h) and (i), counsel for the parties met and conferred in person on January 22, 2024. The parties discussed their positions on this motion. Counsel for Plaintiff indicated that they do not oppose this motion.

/s/ Daniel A. Tishman

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